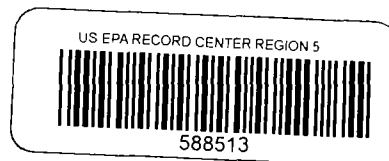




Environmental Protection Agency

4500 S. Sixth Street Springfield, IL. 62706
Ph. (217) 786-6892

October 25, 1983



Refer to: LPC #01904502 - Champaign County
Mahomet/Prairie Paint & Adhesives

Charles Bartholomew Engineering, Inc.
Box 3153
Champaign, Illinois 61821

ATTENTION: Mr. Charles Bartholomew

Dear Mr. Bartholomew:

On October 19, 1983, our attorney, members of my staff, and I met with Mr. Jack Waaler, attorney for the James Campbell estate, to discuss the removal of approximately 85 drums of waste materials stored at the Prairie Paint and Adhesives facility in Mahomet. During this meeting, Mr. Waaler presented us with a copy of your October 5, 1983, proposal for sampling and testing.

Section 722.111 of the 35 Illinois Administrative Code (35 IL. A. C.) requires generators of solid wastes to determine if those wastes are hazardous. Section 725.113(a) of the 35 IL. A. C. requires owners or operators of a storage, treatment, or disposal facility to conduct detailed chemical and physical analyses of their hazardous wastes. To achieve compliance with these regulations we believe the following program will have to be implemented at Prairie Paint and Adhesives:

1. Open each of the drums for visual inspection of the contents. This will provide information on the physical appearance of the waste, and its odor, color, physical state, and number of phases present.
2. For every 5 drums or less containing a similar waste type, collect a representative, composite sample for analysis.
3. Conduct the following analyses for each waste type:
 - a. E.P. Toxicity for lead, cadmium, and chromium
 - b. Flash point (liquids only)

October 25, 1983

c. % solids

d. Identification of solvent

Other analyses may be necessary to meet the requirements of the disposal facility accepting the waste. To determine the suitability of the wastes for recycling, even more analyses may be required. These may include, as you suggested in your October 5, 1983 proposal, identification of vehicle and pigment.

Mr. Waaler indicated on October 19th that he would provide you with copies of analyses completed on samples taken of the waste by IEPA personnel in May. These samples were taken from the 9 drums we were able to open. The rest of the drums were rusted shut or sealed by a tar-like substance. Based on our observations of the drums opened, there will be some difficulty sampling, due to the thickness and stickiness of the waste materials. If you have any questions about our sampling, please contact David Jansen of my staff at the above number.

Mr. Waaler indicated he would ask you to submit to him another proposal for sampling and testing the contents of the drums, based on our requirements. Please send us a copy of any new proposal. If you have any questions or comments on our requirements, please contact us.

We would like to be present at the time any sampling is conducted. Hopefully, any changes in the sampling or testing plan necessitated by field observations will be minimal.

Sincerely,

Glenn D. Savage Jr.

Glenn D. Savage, Jr.
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

GDS/DCJ/cp

cc: DLPC/Division File
DLPC/FOS, Central Region
Jack Waaler/Champaign